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April 10, 2019

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BY ECF

Honorable John G. Koeltl
Daniel Patrick Moynihan
United States Courthouse
Courtroom 14A
500 Pearl Street
New York, New York 10007

Re: *Eastern Profit Corp. Ltd. v. Strategic Vision US, LLC*
18-CV-2185 (JGK)

Your Honor:

We write on behalf of defendant-counterclaim plaintiff Strategic Vision US, LLC (“Strategic Vision”), pursuant to Rule 1(E) of Your Honor’s Individual Practices, to request an approximately ninety (90) day adjournment of the April 15, 2019 discovery deadline set forth in the Court’s pending Amended Scheduling Order to July 15, 2019. *See* ECF Doc. No. 76.

On or about March 29, 2019, our firm substituted in as counsel to Strategic Vision. We understand from recent communications with our client and outgoing counsel that there remain multiple outstanding discovery issues in this action, including a number of important depositions yet to be scheduled. Moreover, we are still in the process of obtaining the case file from outgoing counsel, including the parties’ document productions.

We have sought consent to the requested adjournment from plaintiff-counterclaim defendant Eastern Profit Corporation Limited (“Eastern”) and counterclaim defendant Guo Wengui, a/k/a Miles Kwok, (“Guo”). Counsel to Guo has consented to the full ninety (90) day adjournment. However, counsel to Eastern has consented to a sixty (60) rather than ninety (90) day adjournment, absent a rationale other than counsel’s belief that the Court would not grant the longer adjournment in light of ones previously granted.

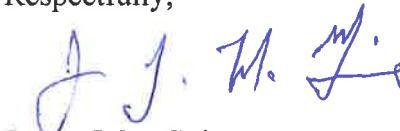
To our knowledge, ours is the third request to extend the discovery deadline in this action. Prior counsel to Strategic Vision made the first such request, and counsel to Eastern the second. Said counsel made both of those requests on consent, and the Court granted both.

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In accordance with Your Honor's Individual Practices, accompanying this writing is a proposed revised Scheduling Order, reflecting the requested extended discovery deadline.

We are appreciative of the Court's attention and consideration.

Respectfully,



James J. McGuire

cc: All Counsel of Record (by ECF)